

Michael P. Kenny, Esq. (admitted *pro hac vice*)  
mike.kenny@alston.com  
Debra D. Bernstein, Esq. (admitted *pro hac vice*)  
debra.bernstein@alston.com  
Matthew D. Kent, Esq. (admitted *pro hac vice*)  
matthew.kent@alston.com

**ALSTON & BIRD LLP**  
1201 West Peachtree Street  
Atlanta, Georgia 30309-3424  
Tel: (404) 881-7000  
Facsimile: (404) 881-7777

James M. Wagstaffe, Esq. (SBN 95535)  
wagstaffe@kerrwagstaffe.com  
**KERR & WAGSTAFFE LLP**  
101 Mission Street, 18th Floor  
San Francisco, California 94105-1576  
Tel: (415) 371-8500  
Facsimile: (415) 371-0500

*Attorneys for Plaintiffs Dell Inc. and Dell Products L.P.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC

MDL No. 1917

This Document Relates to: Individual Case  
No. 13-cv-2171 (SC)

DELL INC. AND DELL PRODUCTS L.P.,

PLAINTIFFS,

v.

HITACHI, LTD., *ET AL.*,

DEFENDANTS.

**[PROPOSED] ORDER DENYING  
DEFENDANTS' JOINT MOTION  
FOR SUMMARY JUDGMENT WITH  
RESPECT TO DELL'S FOREIGN  
PURCHASES UNDER THE FTAIA**

**[PROPOSED] ORDER**

Upon consideration of Dell's Response in Opposition to Defendants' Joint Motion for Summary Judgment with Respect to Dell's Foreign Purchases Under the FTAIA, it is hereby ORDERED that Defendants' Joint Motion for Summary Judgment [MDL Dkt. No. 3003] is DENIED.

Dated: \_\_\_\_\_, 2015

---

**The Honorable Samuel Conti**  
**Northern District of California**